## **MEMORANDUM**



August 16, 2024

Re: Petition No. 1442 - SR Litchfield, LLC - Litchfield Solar Project

Wilson Road, Litchfield and Rossi Road, Torrington

On behalf of SR Litchfield, LLC, All-Points Technology Corporation, P.C. ("APT") performed an evaluation with respect to the medium voltage ("MV") interconnection between the area of Pond 9 (Highland Avenue Array) and area of Pond 5 (Wilson Road Array) which crosses over a relatively narrow forested corridor (identified as Wetland 3C/4C/2N) just east of the existing Eversource electrical transmission right-of-way ("ROW").

The proposed overhead MV interconnection between these two arrays will be installed on wooden poles that require clearing of trees to satisfy conductor clearance requirements by providing a 50-foot wide clearance zone. Work proposed within the wetland crossing will be performed using standard best management practices to avoid and minimize any incidental impact to wetland soils. As a result, no permanent direct wetland impacts would result from the proposed MV installation as proposed wooden poles would be placed outside of the wetland boundaries to span the relatively narrow wetland feature. Tree clearing and electrical line installation equipment would be staged on timber mats to protect the underlying wetland soils. Temporary wetland impacts associated with placement of the timber mats would be  $\pm 1,400$  SF and any restoration of disturbed wetland soils with the application of a native New England Wetland Seed Mix would occur upon removal of the mats. Approximately 4,000 SF of forested wetland habitat would be converted to scrub/shrub type wetland habitat, considered a relatively minor secondary wetland impact and similar to what exists in the nearby Eversource ROW which crosses over the same wetland system.

The proposed work activities associated with the MV interconnection within this wetland area would also be monitored by APT's Compliance Monitor consistent with ongoing compliance monitoring efforts for the SR Litchfield project APT has been performing, including the completed crossing of Gulf Stream. Details of the contractor sequencing of work activities for the MV work within the wetland, best management practices that will be adhered to, and compliance monitoring that will be performed are provided in the enclosed drawing prepared by HDR.

With the incorporation of best management practices and protection measures that avoid direct wetland impacts and incorporation of compliance monitoring to ensure the contractor is aware of the sensitivity of the proposed work activities, it is our opinion that no likely adverse impact to this relatively small area of wetland tree clearing would result.

In addition, the timing of the MV tree clearing activities will not impact State-listed red bat or hoary bat since tree cutting would be conducted between August 15<sup>th</sup> through April 30<sup>th</sup>, during the bat's non-roosting and hibernation periods, when roosting bats are not anticipated to be present on the Site. As a result, no adverse impact to either red bat or hoary bat would result from the proposed MV tree clearing work.

Please feel free to contact me with any questions at (860) 552-2033 or dgustafson@allpointstech.com

Sincerely,

All-Points Technology Corp., P.C.

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Senior Wetland Scientist